EXHIBIT 3

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
Edward D. Lodgen, Bar No. 155168
Julia V. Lee, Bar No. 252417
2049 Century Park East, Suite 3400
Los Angeles, CA 90067-3208
Telephone: 310-552-0130
Facsimile: 310-229-5800

Christopher W. Madel
MN Reg. No. 230297 (*pro hac vice pending*)
Jennifer M. Robbins
MN Reg. No. 387745(*pro hac vice pending*)
800 LaSalle Avenue
2800 LaSalle Plaza
Minneapolis, MN 55402-2015
Telephone: 612-349-8500
Facsimile: 612-339-4181

Attorneys for Defendant Portfolio Recovery Associates, LLC

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
ATTORNEYS AT LAW
MINNEAPOLIS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN DIEGO

JESSE MEYER, an individual, on his own behalf and on behalf of all others similarly situated,

Plaintiff,

v.

PORTFOLIO RECOVERY ASSOCIATES, LLC, a Delaware limited liability company, and DOES 1-100, inclusive,
Defendant.

Case No. 37-2011-00083047-CU-BT-CTL

[Assigned for all purposes to the Honorable John S. Meyer]

DEFENDANT PORTFOLIO RECOVERY ASSOCIATES, LLC'S RESPONSES TO PLAINTIFF JESSE MEYER'S FIRST SET OF REQUESTS FOR ADMISSIONS

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ATTORNEYS AT LAW
MINNEAPOLIS

REQUEST FOR ADMISSION NO. 12:

Defendant Portfolio Recovery Associates, LLC is requested to admit that:

PRA placed a telephone call to MEYER on September 1, 2010.

ANSWER:

Subject to and without waiving its General Objections, PRA admits.

REQUEST FOR ADMISSION NO. 13:

Defendant Portfolio Recovery Associates, LLC is requested to admit that:

PRA used an electronic device to dial the TELEPHONE NUMBER on September 1, 2010.

ANSWER:

PRA objects to the phrase "electronic device" as vague and ambiguous. Subject to and without waiving the foregoing objections, PRA admits.

REQUEST FOR ADMISSION NO. 14:

Defendant Portfolio Recovery Associates, LLC is requested to admit that:

None of PRA's AGENTS manually dialed the TELEPHONE NUMBER when PRA called the TELEPHONE NUMBER on September 1, 2010.

(As used in these Requests for Admission, the phrase "PRA's AGENTS" refers to any natural person who is an employee or other agent of PRA.)

ANSWER:

PRA objects to the phrase "manually dialed" as vague and ambiguous. Subject to and without waiving the foregoing objections, PRA admits.

REQUEST FOR ADMISSION NO. 15:

Defendant Portfolio Recovery Associates, LLC is requested to admit that:

PRA placed a telephone call to MEYER on November 4, 2010.

ANSWER:

Subject to and without waiving its General Objections, PRA admits.

REQUEST FOR ADMISSION NO. 16:

Defendant Portfolio Recovery Associates, LLC is requested to admit that:

PRA used an electronic device to dial the TELEPHONE NUMBER on November 4, 2010.

ANSWER:

PRA objects to the phrase "electronic device" as vague and ambiguous. Subject to and without waiving the foregoing objections, PRA admits.

REQUEST FOR ADMISSION NO. 17:

Defendant Portfolio Recovery Associates, LLC is requested to admit that:

None of PRA's AGENTS manually dialed the TELEPHONE NUMBER when PRA called the TELEPHONE NUMBER on November 4, 2010.

ANSWER:

PRA objects to the phrase "manually dialed" as vague and ambiguous. Subject to and without waiving the foregoing objections, PRA admits.

REQUEST FOR ADMISSION NO. 18:

Defendant Portfolio Recovery Associates, LLC is requested to admit that:

PRA placed a telephone call to MEYER on December 14, 2010.

ANSWER:

Subject to and without waiving its General Objections, PRA admits.

REQUEST FOR ADMISSION NO. 19:

Defendant Portfolio Recovery Associates, LLC is requested to admit that:

PRA used an electronic device to dial the TELEPHONE NUMBER on December 14, 2010.

ANSWER:

PRA objects to the phrase "electronic device" as vague and ambiguous. Subject to and without waiving the foregoing objections, PRA admits.

REQUEST FOR ADMISSION NO. 20:

Defendant Portfolio Recovery Associates, LLC is requested to admit that:

None of PRA's AGENTS manually dialed the TELEPHONE NUMBER when PRA called the TELEPHONE NUMBER on December 14, 2010.

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ATTORNEYS AT LAW
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ANSWER:

PRA objects to the phrase "manually dialed" as vague and ambiguous. Subject to and without waiving the foregoing objections, PRA admits.

REQUEST FOR ADMISSION NO. 21:

Defendant Portfolio Recovery Associates, LLC is requested to admit that:

PRA placed a telephone call to MEYER on January 4, 2011.

ANSWER:

Subject to and without waiving its General Objections, PRA admits.

REQUEST FOR ADMISSION NO. 22:

Defendant Portfolio Recovery Associates, LLC is requested to admit that:

PRA used an electronic device to dial the TELEPHONE NUMBER on January 4, 2011.

ANSWER:

PRA objects to the phrase "electronic device" as vague and ambiguous. Subject to and without waiving the foregoing objections, PRA admits.

REQUEST FOR ADMISSION NO. 23:

Defendant Portfolio Recovery Associates, LLC is requested to admit that:

None of PRA's AGENTS manually dialed the TELEPHONE NUMBER when PRA called the TELEPHONE NUMBER on January 4, 2011.

ANSWER:

PRA objects to the phrase "manually dialed" as vague and ambiguous. Subject to and without waiving the foregoing objections, PRA admits.

REQUEST FOR ADMISSION NO. 24:

Defendant Portfolio Recovery Associates, LLC is requested to admit that:

The electronic device that PRA used to dial the TELEPHONE NUMBER on September 1, 2010 is capable of storing a LIST OF TELEPHONE NUMBERS.

(As used in these Requests for Admission, the phrase "LIST OF TELEPHONE NUMBERS" refers to a set of two or more telephone numbers which PRA has collected

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ATTORNEYS AT LAW
MINNEAPOLIS

for the purpose of collecting a debt.)

ANSWER:

PRA objects to the definition of "list of telephone numbers" as vague, ambiguous, and a misrepresentation of the format in which telephone numbers are stored. Subject to and without waiving the foregoing objections, PRA admits that the device used to dial the TELEPHONE NUMBER on September 1, 2010 is capable of storing more than two telephone numbers.

REQUEST FOR ADMISSION NO. 25:

Defendant Portfolio Recovery Associates, LLC is requested to admit that:

The electronic device that PRA used to dial the TELEPHONE NUMBER on November 4, 2010 is capable of storing a LIST OF TELEPHONE NUMBERS.

ANSWER:

PRA objects to the definition of "list of telephone numbers" as vague, ambiguous, and a misrepresentation of the format in which telephone numbers are stored. Subject to and without waiving the foregoing objections, PRA admits that the device used to dial the TELEPHONE NUMBER on November 4, 2010 is capable of storing more than two telephone numbers.

REQUEST FOR ADMISSION NO. 26:

Defendant Portfolio Recovery Associates, LLC is requested to admit that:

The electronic device that PRA used to dial the TELEPHONE NUMBER on December 14, 2010 is capable of storing a LIST OF TELEPHONE NUMBERS.

ANSWER:

PRA objects to the definition of "list of telephone numbers" as vague, ambiguous, and a misrepresentation of the format in which telephone numbers are stored. Subject to and without waiving the foregoing objections, PRA admits that the device used to dial the TELEPHONE NUMBER on December 14, 2010 is capable of storing more than two telephone numbers.

REQUEST FOR ADMISSION NO. 27:

Defendant Portfolio Recovery Associates, LLC is requested to admit that:

The electronic device that PRA used to dial the TELEPHONE NUMBER on January 4, 2011 is capable of storing a LIST OF TELEPHONE NUMBERS.

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ANSWER:

PRA objects to the definition of "list of telephone numbers" as vague, ambiguous, and a misrepresentation of the format in which telephone numbers are stored. Subject to and without waiving the foregoing objections, PRA admits that the device used to dial the TELEPHONE NUMBER on January 4, 2011 is capable of storing more than two telephone numbers.

REQUEST FOR ADMISSION NO. 28:

Defendant Portfolio Recovery Associates, LLC is requested to admit that:

When PRA makes a call in the course of attempting to collect a debt, PRA does not have any policy that prevents PRA from calling CELLULAR TELEPHONE NUMBERS.

(As used in these Requests for Admission, the phrase "CELLULAR TELEPHONE NUMBER" means a cellular telephone number that PRA did not obtain either from a CREDITOR or from the person that uses that cellular telephone number.)

ANSWER:

PRA objects to the term "policy" as vague and ambiguous. PRA further objects to the definition for "CELLULAR TELEPHONE NUMBERS" as vague, ambiguous, inaccurate, and misleading. Subject to and without waiving the foregoing objections, PRA denies.

REQUEST FOR ADMISSION NO. 29:

Defendant Portfolio Recovery Associates, LLC is requested to admit that:

PRA has called more than forty CALIFORNIA RESIDENTS' SKIP-TRACED TELEPHONE NUMBERS since January 4, 2007.

(As used in these Requests for Admission, (1) the phrase "CALIFORNIA RESIDENT" means a person whom PRA's records identify as residing in California; and (2) the phrase "SKIP-TRACED TELEPHONE NUMBER" means a telephone number that PRA did not obtain either from a CREDITOR or from the person that uses that cellular telephone number.)

ANSWER:

PRA objects to this Request as vague, ambiguous, overly broad, and unduly burdensome.

PRA further objects to this Request because it seeks information outside of PRA's possession, custody, and control. PRA also objects to the definition for "SKIP-TRACED TELEPHONE NUMBER" as vague, ambiguous, inaccurate, and misleading. Subject to and without waiving the foregoing objections, PRA admits that according to records currently kept, PRA has called more than 40 California residents using a telephone number that PRA did not obtain either from a creditor or from the person that uses that cellular telephone number.

REQUEST FOR ADMISSION NO. 30:

Defendant Portfolio Recovery Associates, LLC is requested to admit that:

PRA has called more than one hundred CALIFORNIA RESIDENTS' SKIP-TRACED TELEPHONE NUMBERS since January 4, 2007.

ANSWER:

PRA objects to this Request as vague, ambiguous, overly broad, and unduly burdensome. PRA further objects to this Request because it seeks information outside of PRA's possession, custody, and control. PRA also objects to the definition for "SKIP-TRACED TELEPHONE NUMBER" as vague, ambiguous, inaccurate, and misleading. Subject to and without waiving the foregoing objections, PRA admits that according to records currently kept PRA has called more than 100 California residents using a telephone number that PRA did not obtain either from a creditor or from the person that uses that cellular telephone number.

REQUEST FOR ADMISSION NO. 31:

Defendant Portfolio Recovery Associates, LLC is requested to admit that:

PRA has called more than four hundred CALIFORNIA RESIDENTS' SKIP-TRACED TELEPHONE NUMBERS since January 4, 2007.

ANSWER:

PRA objects to this Request as vague, ambiguous, overly broad, and unduly burdensome. PRA further objects to this Request because it seeks information outside of PRA's possession, custody, and control. PRA also objects to the definition for "SKIP-TRACED TELEPHONE NUMBER" as vague, ambiguous, inaccurate, and misleading. Subject to and without waiving the foregoing objections, PRA admits that according to records currently kept PRA has called more

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
ATTORNEYS AT LAW
MINNEAPOLIS

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
ATTORNEYS AT LAW
MINNEAPOLIS

than 400 California residents using a telephone number that PRA did not obtain either from a creditor or from the person that uses that cellular telephone number.

REQUEST FOR ADMISSION NO. 32:

Defendant Portfolio Recovery Associates, LLC is requested to admit that:

More than four years have passed since the cause of action that the COMPUTER LEARNING CENTER asserted against MEYER and assigned to PRA accrued.

ANSWER:

PRA objects to the phrase "cause of action that the Computer Learning Center asserted" as vague and ambiguous. PRA further objects to this request as irrelevant and not likely to result in the discovery of admissible evidence. Subject to the foregoing objections, PRA denies this Request as stated. PRA affirmatively states that more than four years have passed since the charge-off date of the debt Meyer owed to the Computer Learning Center.

DATED: April 1, 2011

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

By ______________________
Edward D. Lodgen
Julia V. Lee
Attorneys for Defendant
PORTFOLIO RECOVERY ASSOCIATES, LLC

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
ATTORNEYS AT LAW
LOS ANGELES

VERIFICATION

I am a Vice President for defendant, Portfolio Recovery Associates, LLC, a party to this action. I have read the foregoing DEFENDANT PORTFOLIO RECOVERY ASSOCIATES, LLC'S ANSWER TO PLAINTIFF JESSE MEYER'S REQUESTS FOR ADMISSION, SET ONE and am authorized to sign this Verification. I am informed that no single officer of Portfolio Recovery Associates, LLC has personal knowledge of all matters stated in the foregoing responses, that authorized employees, agents, have assembled the facts stated in such responses and/or legal representatives of Portfolio Recovery Associates, LLC. I am further informed and believe and on that ground allege that the facts stated in such responses are true and correct, based on the records of Portfolio Recovery Associates, LLC and information reasonably available to its employees, agents, and/or legal representatives.

Executed on April 7, 2011, in Norfolk, Virginia.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Robert Rey